

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 08 CR 276
v.)	The Honorable Blanche M. Manning,
)	Judge Presiding
WILLIAM COZZI,)	
)	
)	
Defendant.)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

NOW COMES attorney WILLIAM R. SULLIVAN (“Sullivan”), one of the attorneys for Defendant, William Cozzi, and moves this Honorable Court for leave to withdraw as attorney from this cause. In support of his motion, the following is offered:

1. Undersigned counsel, William R. Sullivan, is currently employed as an associate at the law firm of Genson & Gillespie.
2. In the course of Mr. Sullivan’s employment with Genson & Gillespie, he filed an appearance in this cause, along with lead counsel Terence P. Gillespie, on behalf of Defendant, William Cozzi.
3. As of Friday, August 29, 2008, Sullivan will leave the employ of Genson & Gillespie.
4. On Tuesday September 2, 2008, Sullivan will begin a clerkship for the Honorable Michael P. Toomin at the Illinois Appellate Court, First District.
5. As a Law Clerk at the Illinois Appellate Court, Sullivan is precluded from representing private clients in any federal, state, or local matter.

6. Terence P. Gillespie will continue as counsel for Mr. Cozzi.

7. In light of the continued presence of counsel on behalf of Mr. Cozzi, there is every reason to believe his right to representation in this cause is safeguarded.

WHEREFORE and based upon the foregoing, undersigned counsel, William R. Sullivan, respectfully requests that this Honorable Court grant him leave to withdraw as counsel in this cause.

Respectfully submitted,

/s/ William R. Sullivan
WILLIAM R. SULLIVAN
Attorney for Defendant, William Cozzi

WILLIAM R. SULLIVAN
GENSON & GILLESPIE
53 W. Jackson Blvd., Suite 1420
Chicago, Illinois 60604
(312) 726-9015

CERTIFICATE OF SERVICE

I hereby certify the foregoing Motion for Leave to Withdraw as Counsel was served on August 27, 2008, in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the District Court's system as to ECF Filers.

/s/ William R. Sullivan

WILLIAM R. SULLIVAN

Attorney for Defendant, William Cozzi

WILLIAM R. SULLIVAN
GENSON & GILLESPIE
53 W. Jackson Blvd., Suite 1420
Chicago, Illinois 60604
(312) 726-9015